



HILL RIVKINS L
45 Broadway, Suite 1500, New York, NY 10
Tel: 212 669-0600 Fax: 212 669-0698/
e-mail: thefirm@hillrivkins.com
Website: www.hillrivkins.com

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JUSTIN M. HEILIG
Direct: (212) 669-0644
jheilig@hillrivkins.com

December 31, 2020

Via CM/ECF System

The Honorable Analisa Torres
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 15D
New York, NY 10007

Re: Letter Motion for Adjournment of Initial Pretrial Conference
Farm Direct Supply, LLC v. MSC Mediterranean Shipping Co.
S.D.N.Y. Case No. 1:20-cv-09190-AT
Our Ref: 35045

Dear Judge Torres:

We represent Plaintiff Farm Direct Supply, LLC in the above-referenced action. In accordance with section I.C of Your Honor's individual rules, we write to respectfully request a 30-day adjournment of the initial pretrial conference currently scheduled for January 11, 2021 at 10:40 a.m. This is the first such request.

Plaintiff filed suit on November 3, 2020, seeking to recover for alleged damage to a shipment of fresh asparagus transported by ocean carriage from Peru to the United States. Defendant MSC Mediterranean Shipping Company S.A. (the ocean carrier) has not yet appeared in this action, but its house counsel Nicholas Hargreaves (reading in copy) did execute a waiver of service on November 24, 2020, pursuant to which MSC's answer is now due by January 22, 2021. *See* Dkt. #9.

We advised Mr. Hargreaves of the current submission deadline for the parties' joint letter and proposed case management plan (Monday, January 4, 2021) and requested his consent to this adjournment request on December 29, 2020, but to date we have not received a response. Moreover, the parties have yet to confer under Rule 26(f).

NEW JERSEY
102 South Broadway
South Amboy, NJ 08879-1708
Tel: 732 838-0300 Fax: 732 316-2365
e-mail: thefirm@hillrivkins.com

TEXAS
55 Waugh Drive, Suite 1200
Houston, Texas 77007
Tel: 713 222-1515 Fax: 713 222-1359
e-mail: thefirm@hillrivkins.com

CALIFORNIA
Hill Rivkins Brown & Associates
11140 Fair Oaks Boulevard, Suite 100
Fair Oaks, CA 95628-5126
Tel: 916 535-0263 Fax: 916 535-0268
e-mail: thefirm@brnlaw.com

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Accordingly, we respectfully request a 30-day adjournment of the initial pretrial conference to an available date in mid-February 2021.

We thank the Court for its attention to the foregoing request and stand ready to answer any questions that the Court may have regarding this action.

Respectfully submitted,
HILL RIVKINS LLP



Justin M. Heilig

Cc: Nicholas Hargreaves, Esq. (via email: nicholas.hargreaves@msc.com)

GRANTED. The initial pretrial conference scheduled for January 11, 2021, is ADJOURNED to **February 16, 2021**, at **11:00 a.m.** By **February 8, 2021**, the parties shall file their joint letter and proposed case management plan.

SO ORDERED.

Dated: January 4, 2021
New York, New York



ANALISA TORRES
United States District Judge